



2/23/04-00210
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February 23, 2004

138804.RIFR
04-KAH-0096

Commander
LANTNAVFACENGCOM
Attention: Mr. Stephen Garth, Code EV22-DSG
6506 Hampton Boulevard
Norfolk, VA 23508-1278

Subject: Responses to Comments - Final Remedial Investigation/Human Health Risk
Assessment/ Ecological Risk Assessment for Site 2
St. Juliens Creek Annex, Chesapeake, Virginia
N62470-95-D-6007, CTO 0028

Dear Mr. Garth:

CH2M HILL has prepared the following responses to USEPA III comments submitted November 13, 2003 on the Draft Remedial Investigation/Human Health Risk Assessment for Site 2, St. Juliens Creek Annex, Chesapeake, Virginia by Mr. Todd Richardson of USEPA. Responses to comments are addressed herein.

1. Comment: Page **VI**. The report states that no MCL exceedances were noted in deep gw (Yorktown Aquifer). The text should also indicate whether **RBC** exceedances were observed in this aquifer. (This comment also applies to pages 5-17 and 9-1).

Response: The text in the Executive Summary, Section 5-17, and Section 9-1 has been amended to summarize the RBC exceedances in deep groundwater (Yorktown Aquifer).

2. Comment: Page **VII**. Risks from contaminants in shallow gw (Columbia Aquifer) were not evaluated because this aquifer "is not considered a regional potable water source." More concrete justification for excluding this pathway should be provided. For example, if this aquifer is not potable because of poor water quality (perhaps due to saline intrusion) or low yield, statements to this effect should be included in the report. (This comment also applies to pages 7-7 and 9-3.)

Commander
Page 2
February 23, 2004

Sincerely,
CH2M HILL



William J. Friedmann, Jr., P.G.
Activity Manager

cc: Mr. Todd Richardson/USEPA Region III (1copy)
Ms. Debbie Miller/VDEQ (1copy)
Ms. Valerie Walker/CNRMA (1copy)
Ms. Kim Henderson/CH2M HILL-VBO (1copy)
Ms. Jean Mann/LANTNAVFACENGCOM (Cover Letter Only)